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16 EMBLAZE ONE INC., LIMITLESS X INC.,  
17 JASPREET MATHER and KENNETH HALLER

18 UNITED STATES DISTRICT COURT  
19 FOR THE CENTRAL DISTRICT OF CALIFORNIA

20 HARPO, INC. and OW LICENSING  
21 COMPANY LLC,

22 Plaintiffs,

23 v.

24 EMBLAZE ONE INC., LIMITLESS  
25 X INC., JASPREET MATHER,  
26 KENNETH HALLER and JOHN  
27 DOES 1 – 30,

28 Defendants.

Case No. 2:23-cv-04459-JGB-AS

**ANSWER TO COMPLAINT AND  
AFFIRMATIVE DEFENSES**

**JURY DEMAND**

1 Defendants EMBLAZE ONE, INC., LIMITLESS X, INC., JASPREET  
 2 MATHER, and KENNETH HALLER (“Defendants”), by and through their  
 3 undersigned counsel, hereby submit the following Answer and Affirmative  
 4 Defenses to Plaintiffs HARPO, INC. and OW LICENSING COMPANY, LLC’s  
 5 (“Plaintiffs”) Complaint filed June 7, 2023 (the “Complaint”). To the extent that  
 6 any allegation is not admitted or denied herein, Defendants deny any and all such  
 7 allegation(s).

### 8 9 **NATURE OF ACTION**

10 1. Defendants lack knowledge or information sufficient to either admit  
 11 or deny the allegations in Paragraph 1 of the Complaint and therefore deny same.

12 2. Defendants lack knowledge or information sufficient to either admit  
 13 or deny the allegations in Paragraph 2 of the Complaint and therefore deny same.

14 3. Defendants lack knowledge or information sufficient to either admit  
 15 or deny the allegations in Paragraph 3 of the Complaint and therefore deny same.

16 4. Defendants deny the allegation that they used Ms. Winfrey’s  
 17 celebrity, name, and/or brand to sell products. Defendants lack knowledge or  
 18 information sufficient to either admit or deny the other allegations in Paragraph 4  
 19 of the Complaint and therefore deny same.

20 5. Defendants deny that any alleged actions were unlawful, willful,  
 21 intentional, or otherwise undertaken maliciously, knowingly, intentionally or with  
 22 conscious disregard for Plaintiffs’ rights. Defendants deny the allegations in  
 23 Paragraph 5 of the Complaint.

24 6. Defendants deny the allegations that they “duped” consumers and  
 25 “illegally profited” off of Ms. Winfrey’s name. Defendants lack knowledge or  
 26 information sufficient to either admit or deny the other allegations in Paragraph 6  
 27 of the Complaint and therefore deny same.

## THE PARTIES

7. Defendants lack knowledge or information sufficient to either admit or deny the allegations in Paragraph 7 of the Complaint and therefore deny same.

8. Defendants lack knowledge or information sufficient to either admit or deny the allegations in Paragraph 8 of the Complaint and therefore deny same.

9. Defendants admit that Emblaze One is a Nevada corporation. Defendants affirmatively state that Emblaze's principal place of business is located at 9454 Wilshire Blvd., Suite 300, Beverly Hills, California 90212. Defendants deny that Emblaze is associated with the other addresses alleged in Paragraph 9 of the Complaint.

10. Defendants affirmatively state that Limitless X is a Nevada corporation with its principal place of business located at 9454 Wilshire Blvd., Suite 300, Beverly Hills, California 90212. Defendants deny that Limitless X is associated with the other addresses alleged in Paragraph 9 of the Complaint.

11. Defendants admit that Mr. Mathur is the CEO of Emblaze, which is headquartered in and does business out of California.

12. Defendants affirmatively state that Mr. Haller is the President of Limitless X Holdings, Inc., the parent company of Defendant Limitless X. Mr. Haller has no role with either Defendant Emblaze or Limitless X. Defendants deny the allegations of paragraph 12 of the Complaint.

13. Defendants lack knowledge or information sufficient to either admit or deny the allegations in Paragraph 13 of the Complaint and therefore deny same.

## JURISDICTION AND VENUE

14. Paragraph 14 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 14 of the Complaint.



1           24. Defendants lack knowledge or information sufficient to either admit  
2 or deny the allegations in Paragraph 24 of the Complaint and therefore deny same.

3           25. Defendants lack knowledge or information sufficient to either admit  
4 or deny the allegations in Paragraph 25 of the Complaint and therefore deny same.

5           26. Defendants lack knowledge or information sufficient to either admit  
6 or deny the allegations in Paragraph 26 of the Complaint and therefore deny same.

7  
8 **HARPO'S TRADEMARKS**

9           27. Defendants lack knowledge or information sufficient to either admit  
10 or deny the allegations in Paragraph 27 of the Complaint and therefore deny same.

11           28. Defendants lack knowledge or information sufficient to either admit  
12 or deny the allegations in Paragraph 28 of the Complaint and therefore deny same.

13           29. Defendants acknowledge that Plaintiffs attached what appear to be  
14 copies of Plaintiff Harpo's identified trademark registrations as Exhibit A.  
15 Defendants lack knowledge or information sufficient to either admit or deny the  
16 allegations in Paragraph 29 of the Complaint, including the chart in Paragraph 29  
17 of the Complaint and Exhibit A, and therefore deny same.

18           30. Defendants lack knowledge or information sufficient to either admit  
19 or deny the allegations in Paragraph 30 of the Complaint and therefore deny same.

20           31. Defendants lack knowledge or information sufficient to either admit  
21 or deny the allegations in Paragraph 31 of the Complaint and therefore deny same.

22           32. Defendants lack knowledge or information sufficient to either admit  
23 or deny the allegations in Paragraph 32 of the Complaint and therefore deny same.

24           33. Defendants lack knowledge or information sufficient to either admit  
25 or deny the allegations in Paragraph 33 of the Complaint and therefore deny same.

**DEFENDANTS' UNAUTHORIZED ACTIVITIES**

34. Defendants deny that any alleged actions were undertaken intentionally or conspicuously as to Plaintiffs. Defendants deny the allegations in Paragraph 34 of the Complaint.

35. Defendants deny the allegations in Paragraph 35 of the Complaint.

36. Defendants deny the allegations in Paragraph 36 of the Complaint.

37. Defendants acknowledge that Plaintiffs incorporated what purport to be screen shots of advertisements for products alleged to be Defendants'. Defendants deny the allegations in Paragraph 37 of the Complaint.

38. Defendants deny the allegations in Paragraph 38 of the Complaint.

39. Defendants acknowledge that Plaintiffs incorporated what purport to be screen shots of advertisements for products alleged to be Defendants'. Defendants deny the allegations in Paragraph 39 of the Complaint.

40. Defendants deny the allegations in Paragraph 40 of the Complaint.

41. Defendants acknowledge that Plaintiffs incorporated what purport to be screen shots of advertisements for products alleged to be Defendants'. Defendants deny the allegations in Paragraph 41 of the Complaint.

42. Defendants deny the allegations in Paragraph 42 of the Complaint.

43. Defendants deny the allegations in Paragraph 43 of the Complaint.

44. Defendants acknowledge that Plaintiffs incorporated what purport to be screen shots of advertisements for products alleged to be Defendants'. Defendants deny the allegations in Paragraph 44 of the Complaint.

45. Defendants deny the allegations in Paragraph 45 of the Complaint.

46. Defendants deny the allegations in Paragraph 46 of the Complaint.

47. Defendants deny the allegations in Paragraph 47 of the Complaint.

48. Defendants deny the allegations in Paragraph 48 of the Complaint.

49. Defendants lack knowledge or information sufficient to either admit or deny the allegations in Paragraph 49 of the Complaint and therefore deny same.

1           50. Defendants lack knowledge or information sufficient to either admit  
2 or deny the allegations in Paragraph 50 of the Complaint and therefore deny same.

3           51. Paragraph 51 of the Complaint contains legal conclusions for which  
4 no response is required. To the extent a response is required, Defendants deny the  
5 allegations in Paragraph 51 of the Complaint.

## 6 7 **CLAIMS FOR RELIEF**

### 8 **FIRST CAUSE OF ACTION**

### 9 **FEDERAL TRADEMARK DILUTION**

10 **15 U.S.C. § 1125(c)**

11 **(by Plaintiff Harpo)**

12           52. Defendants incorporate their responses to each of the preceding  
13 paragraphs by reference as if fully set forth herein.

14           53. Defendants lack knowledge or information sufficient to either admit  
15 or deny the allegations in Paragraph 53 of the Complaint and therefore deny same.  
16 Further, Paragraph 53 of the Complaint contains legal conclusions for which no  
17 response is required. To the extent a response is required, Defendants deny the  
18 allegations in Paragraph 53 of the Complaint.

19           54. Defendants lack knowledge or information sufficient to either admit  
20 or deny the allegations in Paragraph 54 of the Complaint and therefore deny same.  
21 Further, Paragraph 54 of the Complaint contains legal conclusions for which no  
22 response is required. To the extent a response is required, Defendants deny the  
23 allegations in Paragraph 54 of the Complaint.

24           55. Defendants lack knowledge or information sufficient to either admit  
25 or deny the allegations in Paragraph 55 of the Complaint and therefore deny same.  
26 Further, Paragraph 55 of the Complaint contains legal conclusions for which no  
27 response is required. To the extent a response is required, Defendants deny the  
28 allegations in Paragraph 55 of the Complaint.

1           56. Paragraph 56 of the Complaint contains legal conclusions for which  
2 no response is required. To the extent a response is required, Defendants deny the  
3 allegations in Paragraph 56 of the Complaint.

4           57. Paragraph 57 of the Complaint contains legal conclusions for which  
5 no response is required. To the extent a response is required, Defendants deny the  
6 allegations in Paragraph 57 of the Complaint.

7           58. Paragraph 58 of the Complaint contains legal conclusions for which  
8 no response is required. To the extent a response is required, Defendants deny the  
9 allegations in Paragraph 58 of the Complaint.

10          59. Paragraph 59 of the Complaint contains legal conclusions for which  
11 no response is required. To the extent a response is required, Defendants deny the  
12 allegations in Paragraph 59 of the Complaint.

13          60. Paragraph 60 of the Complaint contains legal conclusions for which  
14 no response is required. To the extent a response is required, Defendants deny the  
15 allegations in Paragraph 60 of the Complaint.

16          61. Paragraph 61 of the Complaint contains legal conclusions for which  
17 no response is required. To the extent a response is required, Defendants deny the  
18 allegations in Paragraph 61 of the Complaint.

19          62. Paragraph 62 of the Complaint contains legal conclusions for which  
20 no response is required. To the extent a response is required, Defendants deny the  
21 allegations in Paragraph 62 of the Complaint.

22          63. Paragraph 63 of the Complaint contains legal conclusions for which  
23 no response is required. To the extent a response is required, Defendants deny the  
24 allegations in Paragraph 63 of the Complaint.

25  
26                   **SECOND CAUSE OF ACTION**  
27                   **FEDERAL TRADEMARK INFRINGEMENT**  
28                   **15 U.S.C. § 1114(1)**  
                      **(by Plaintiff Harpo)**



64. Defendants incorporate their responses to each of the preceding paragraphs by reference as if fully set forth herein.

65. Paragraph 65 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 65 of the Complaint.

66. Defendants deny that any alleged actions were willful or reflect an intention with regard to Plaintiffs' rights. Defendants deny the allegations in Paragraph 66 of the Complaint. Further, Paragraph 66 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 66 of the Complaint.

67. Paragraph 67 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 67 of the Complaint.

68. Paragraph 68 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 68 of the Complaint.

69. Defendants deny the allegations in Paragraph 69 of the Complaint. Further, Paragraph 69 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 69 of the Complaint.

**THIRD CAUSE OF ACTION**  
**UNFAIR COMPETITION, FALSE DESIGNATION AND SPONSORSHIP**  
**15 U.S.C. § 1125(a)(1)(A)**  
**(by Plaintiffs Harpo and OW)**

70. Defendants incorporate their responses to each of the preceding paragraphs by reference as if fully set forth herein.

1           71. Paragraph 71 of the Complaint contains legal conclusions for which  
2 no response is required. To the extent a response is required, Defendants deny the  
3 allegations in Paragraph 71 of the Complaint.

4           72. Paragraph 72 of the Complaint contains legal conclusions for which  
5 no response is required. To the extent a response is required, Defendants deny the  
6 allegations in Paragraph 72 of the Complaint.

7           73. Defendants deny that any alleged actions were willful or reflect an  
8 intention with regard to Plaintiffs' rights. Defendants deny the allegations in  
9 Paragraph 73 of the Complaint. Further, Paragraph 73 of the Complaint contains  
10 legal conclusions for which no response is required. To the extent a response is  
11 required, Defendants deny the allegations in Paragraph 73 of the Complaint.

12           74. Paragraph 74 of the Complaint contains legal conclusions for which  
13 no response is required. To the extent a response is required, Defendants deny the  
14 allegations in Paragraph 74 of the Complaint.

15           75. Paragraph 75 of the Complaint contains legal conclusions for which  
16 no response is required. To the extent a response is required, Defendants deny the  
17 allegations in Paragraph 75 of the Complaint.

18           76. Paragraph 76 of the Complaint contains legal conclusions for which  
19 no response is required. To the extent a response is required, Defendants deny the  
20 allegations in Paragraph 76 of the Complaint.

21  
22                           **FOURTH CAUSE OF ACTION**  
23                           **FALSE ADVERTISING**  
24                           **15 U.S.C. § 1125(a)(1)(B)**  
                              **(by Plaintiff OW)**

25           77. Defendants incorporate their responses to each of the preceding  
26 paragraphs by reference as if fully set forth herein.

27           78. Defendants deny the allegations in Paragraph 78 of the Complaint.  
28 Further, Paragraph 78 of the Complaint contains legal conclusions for which no

1 response is required. To the extent a response is required, Defendants deny the  
2 allegations in Paragraph 78 of the Complaint.

3 79. Defendants lack knowledge or information sufficient to either admit  
4 or deny the allegations in Paragraph 79 of the Complaint and therefore deny same.  
5 Further, Paragraph 79 of the Complaint contains legal conclusions for which no  
6 response is required. To the extent a response is required, Defendants deny the  
7 allegations in Paragraph 79 of the Complaint.

8 80. Paragraph 80 of the Complaint contains legal conclusions for which  
9 no response is required. To the extent a response is required, Defendants deny the  
10 allegations in Paragraph 80 of the Complaint.

11 81. Paragraph 81 of the Complaint contains legal conclusions for which  
12 no response is required. To the extent a response is required, Defendants deny the  
13 allegations in Paragraph 81 of the Complaint.

14 82. Defendants lack knowledge or information sufficient to either admit  
15 or deny the allegations in Paragraph 82 of the Complaint and therefore deny same.  
16 Further, Paragraph 82 of the Complaint contains legal conclusions for which no  
17 response is required. To the extent a response is required, Defendants deny the  
18 allegations in Paragraph 82 of the Complaint.

19 83. Paragraph 83 of the Complaint contains legal conclusions for which  
20 no response is required. To the extent a response is required, Defendants deny the  
21 allegations in Paragraph 83 of the Complaint.

22 84. Paragraph 84 of the Complaint contains legal conclusions for which  
23 no response is required. To the extent a response is required, Defendants deny the  
24 allegations in Paragraph 84 of the Complaint.

25  
26 **FIFTH CAUSE OF ACTION**  
27 **COMMON LAW TRADEMARK INFRINGEMENT**  
28 **(by Plaintiff Harpo)**

1           85. Defendants incorporate their responses to each of the preceding  
2 paragraphs by reference as if fully set forth herein.

3           86. Defendants lack knowledge or information sufficient to either admit  
4 or deny the allegations in Paragraph 86 of the Complaint and therefore deny same.  
5 Further, Paragraph 86 of the Complaint contains legal conclusions for which no  
6 response is required. To the extent a response is required, Defendants deny the  
7 allegations in Paragraph 86 of the Complaint.

8           87. Defendants lack knowledge or information sufficient to either admit  
9 or deny the allegations in Paragraph 87 of the Complaint and therefore deny same.  
10 Further, Paragraph 87 of the Complaint contains legal conclusions for which no  
11 response is required. To the extent a response is required, Defendants deny the  
12 allegations in Paragraph 87 of the Complaint.

13           88. Paragraph 88 of the Complaint contains legal conclusions for which  
14 no response is required. To the extent a response is required, Defendants deny the  
15 allegations in Paragraph 88 of the Complaint.

16           89. Defendants lack knowledge or information sufficient to either admit  
17 or deny the allegations in Paragraph 89 of the Complaint and therefore deny same.  
18 Further, Paragraph 89 of the Complaint contains legal conclusions for which no  
19 response is required. To the extent a response is required, Defendants deny the  
20 allegations in Paragraph 89 of the Complaint.

21           90. Paragraph 90 of the Complaint contains legal conclusions for which  
22 no response is required. To the extent a response is required, Defendants deny the  
23 allegations in Paragraph 90 of the Complaint.

24           91. Defendants deny the allegations in Paragraph 91 of the Complaint.  
25 Further, Paragraph 91 of the Complaint contains legal conclusions for which no  
26 response is required. To the extent a response is required, Defendants deny the  
27 allegations in Paragraph 91 of the Complaint.  
28

**SIXTH CAUSE OF ACTION**

**COMMON LAW UNFAIR COMPLETION**

92. Defendants incorporate their responses to each of the preceding paragraphs by reference as if fully set forth herein.

93. Paragraph 93 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 93 of the Complaint.

94. Defendants deny that any allegedly unlawful conduct was wanton or willful, or undertaken knowingly, intentionally, or in reckless disregard for Plaintiffs. Paragraph 91 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 91 of the Complaint.

**SEVENTH CAUSE OF ACTION**  
**UNAUTHORIZED COMMERCIAL USE OF NAME**  
**CAL. CIV. CODE § 3344**  
**(By Plaintiff OW)**

95. Defendants incorporate their responses to each of the preceding paragraphs by reference as if fully set forth herein.

96. Defendants lack knowledge or information sufficient to either admit or deny the allegations in Paragraph 96 of the Complaint and therefore deny same. Further, Paragraph 96 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 96 of the Complaint.

97. Defendants deny that any allegedly unlawful conduct was willful or otherwise undertaken knowingly or intentionally. Further, Paragraph 97 of the Complaint contains legal conclusions for which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 97 of the Complaint.

1           98. Paragraph 98 of the Complaint contains legal conclusions for which  
2 no response is required. To the extent a response is required, Defendants deny the  
3 allegations in Paragraph 98 of the Complaint.

4           99. Defendants lack knowledge or information sufficient to either admit  
5 or deny the allegations in Paragraph 99 of the Complaint and therefore deny same.  
6 Further, Paragraph 99 of the Complaint contains legal conclusions for which no  
7 response is required. To the extent a response is required, Defendants deny the  
8 allegations in Paragraph 99 of the Complaint.

9           100. Paragraph 100 of the Complaint contains legal conclusions for which  
10 no response is required. To the extent a response is required, Defendants deny the  
11 allegations in Paragraph 100 of the Complaint.

12           101. Defendants deny that any allegedly unlawful conduct was malicious,  
13 willful, or otherwise undertaken knowingly or intentionally or with disregard for  
14 Plaintiffs. Further, Paragraph 97 of the Complaint contains legal conclusions for  
15 which no response is required. To the extent a response is required, Defendants  
16 deny the allegations in Paragraph 97 of the Complaint.

17  
18                           **EIGHTH CAUSE OF ACTION**  
19                           **VIOLATION OF COMMON LAW RIGHT OF PUBLICITY**  
20                           **(By Plaintiff OW)**

21           102. Defendants incorporate their responses to each of the preceding  
22 paragraphs by reference as if fully set forth herein.

23           103. Defendants lack knowledge or information sufficient to either admit  
24 or deny the allegations in Paragraph 103 of the Complaint and therefore deny  
25 same. Further, Paragraph 103 of the Complaint contains legal conclusions for  
26 which no response is required. To the extent a response is required, Defendants  
27 deny the allegations in Paragraph 103 of the Complaint.

28           104. Defendants deny that any allegedly unlawful conduct was willful or  
otherwise undertaken knowingly or intentionally. Further, Paragraph 104 of the

1 Complaint contains legal conclusions for which no response is required. To the  
2 extent a response is required, Defendants deny the allegations in Paragraph 104 of  
3 the Complaint.

4 105. Paragraph 105 of the Complaint contains legal conclusions for which  
5 no response is required. To the extent a response is required, Defendants deny the  
6 allegations in Paragraph 105 of the Complaint.

7 106. Paragraph 106 of the Complaint contains legal conclusions for which  
8 no response is required. To the extent a response is required, Defendants deny the  
9 allegations in Paragraph 106 of the Complaint.

10 107. Paragraph 107 of the Complaint contains legal conclusions for which  
11 no response is required. To the extent a response is required, Defendants deny the  
12 allegations in Paragraph 107 of the Complaint.

13 108. Defendants deny that any allegedly unlawful conduct was malicious,  
14 willful, or otherwise undertaken knowingly or intentionally or with disregard for  
15 Plaintiffs. Further, Paragraph 108 of the Complaint contains legal conclusions for  
16 which no response is required. To the extent a response is required, Defendants  
17 deny the allegations in Paragraph 108 of the Complaint.

### 18 19 **PLAINTIFFS' PRAYER FOR RELIEF**

20 Defendants deny that Plaintiffs are entitled to any of the relief requested in  
21 the Complaint's Prayer for Relief.

### 22 23 **AFFIRMATIVE DEFENSES**

#### 24 **FAILURE TO STATE A CLAIM**

25 1. Plaintiffs have failed to state a claim upon which relief may be  
26 granted against Defendants.

1 **LACHES**

2 2. Plaintiffs' claims are barred in whole or in part by the doctrine of  
3 laches. Upon information and belief, Plaintiffs failed to invoke their alleged legal  
4 rights or otherwise act for an extended period of time and it would be inequitable  
5 for Plaintiffs to be granted the extensive relief they seek against Defendants.  
6

7 **ESTOPPEL**

8 3. Plaintiffs' claims are barred in whole or in part by the doctrine of  
9 equitable estoppel. Upon information and belief, Defendants relied on Plaintiffs'  
10 representations to the detriment of Defendants and it would be inequitable for  
11 Plaintiffs to be granted the extensive relief they seek against Defendants.  
12

13 **FAILURE TO MITIGATE**

14 4. Plaintiffs' claims are barred in whole or in part by Plaintiffs' failure to  
15 mitigate any of the alleged damages resulting from Defendants' alleged conduct.  
16 Upon information and belief, Plaintiffs' failure to mitigate is the direct cause of the  
17 extensive relief they are seeking against Defendants.  
18

19 Defendants expressly reserve the right to seek to amend and/or supplement  
20 their Affirmative Defenses as may be necessary.  
21

22 **PRAYER FOR RELIEF**

23 WHEREFORE, Defendants EMBLAZE ONE INC., LIMITLESS X INC.,  
24 JASPREET MATHER and KENNETH HALLER pray for judgment on the claims  
25 of the Complaint as follows:

26 1. That the Complaint be dismissed with prejudice as to all allegations  
27 and claims;  
28



1           2.     That Plaintiffs take nothing and be denied any relief whatsoever by  
2 their claims;

3           3.     That Defendants be awarded their costs in connection with their  
4 defense against the Complaint;

5           4.     That the Court finds this to be an exceptional case under 15 USC  
6 §1117 and that Defendants be awarded their reasonable attorneys' fees; and

7           5.     That Defendants be granted such other and further relief as the Court  
8 may deem just and proper.

9  
10                                   **DEMAND FOR JURY TRIAL**

11 Plaintiff demands a trial by jury on all issues so triable.

12 Dated: April 19, 2024

Respectfully Submitted,

14 By:           /s/ Michael A DiNardo            
15       Michael A. DiNardo, Esq.  
16       YK LAW LLP

17 Samuel Blatnick, Esq. (PHV forthcoming)  
18 Anne Melton, Esq. (PHV pending)  
19 LUCOSKY BROOKMAN LLP

20 Attorneys for Defendants Emblaze One Inc.,  
21 Limitless X Inc., Jaspreet Mather and  
22 Kenneth Haller  
23  
24  
25  
26  
27  
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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail, facsimile transmission and/or first-class mail on this same date.

/s/ Michael A. DiNardo

Michael A. DiNardo